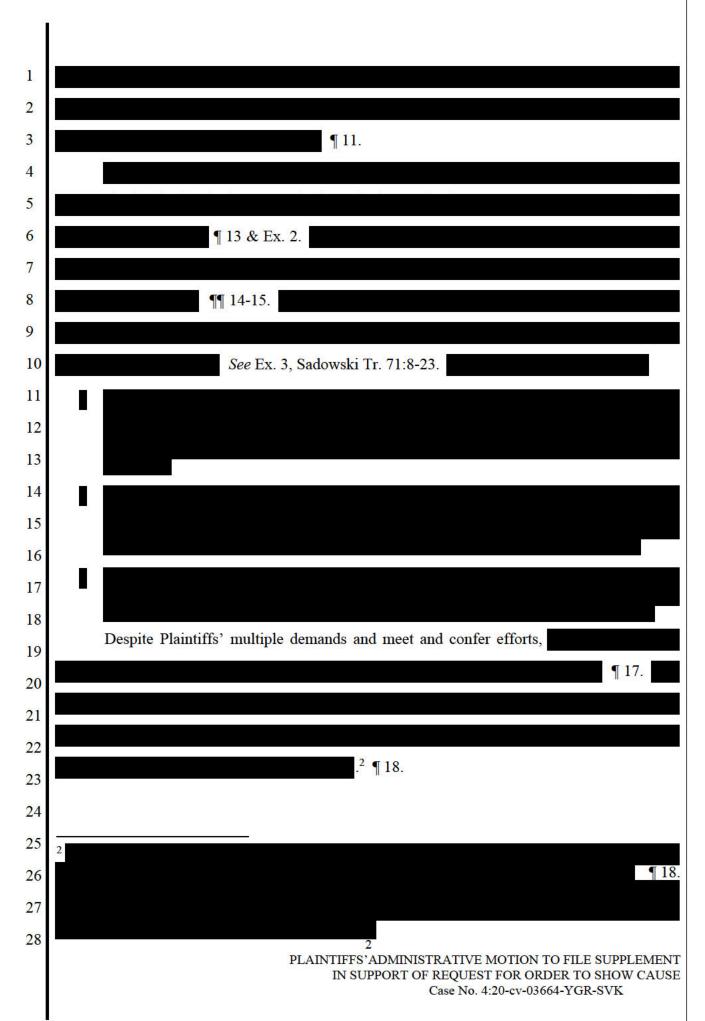
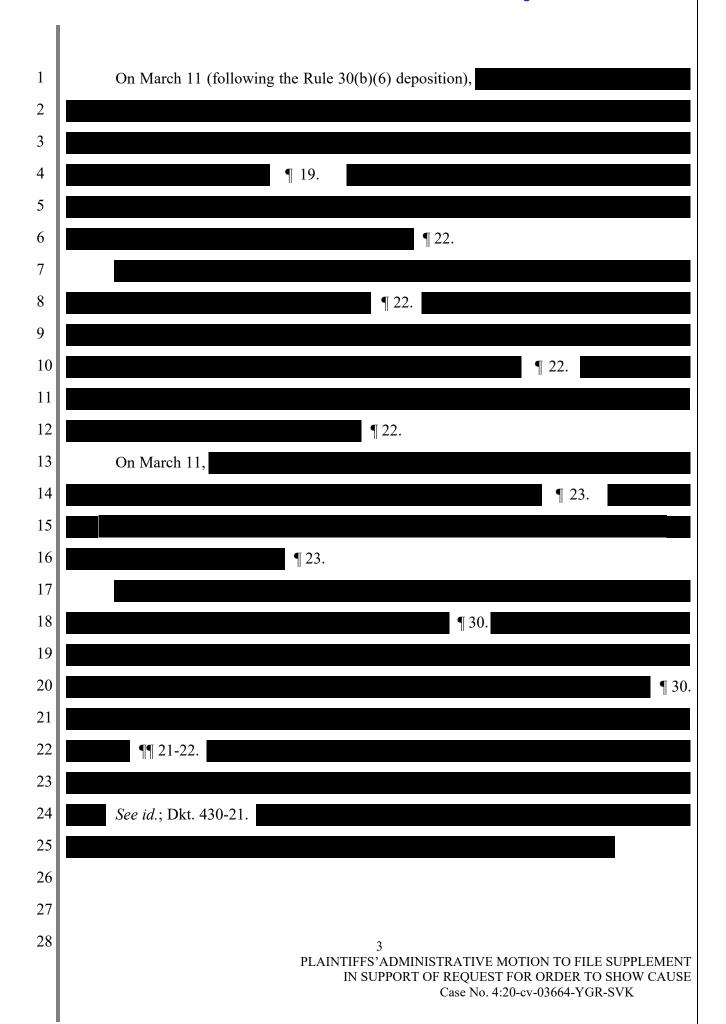
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19	NORTHERN DISTR	RICT OF CALIFORNIA
20	CHACOM PRONDI WHILLIAM DWATT	C N 420 02((4 VCD CVV
20	CHASOM BROWN, WILLIAM BYATT,	Case No.: 4:20-cv-03664-YGR-SVK
21	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO	PLAINTIFFS' ADMINISTRATIVE
22	individually and on behalf of all similarly	MOTION TO FILE SUPPLEMENT IN
22	situated,	SUPPORT OF THEIR MOTION FOR
23	,	ORDER REQUIRING GOOGLE TO SHOW CAUSE WHY IT SHOULD
	Plaintiffs,	NOT BE SANCTIONED FOR
24	VS.	DISCOVERY MISCONDUCT;
25	COOCLETIC	DELCARATION OF MARK C. MAO
23	GOOGLE LLC,	The Honorable Susan van Keulen
26	Defendant.	Courtroom 6 – 4th Floor
27		Date: April 21, 2022
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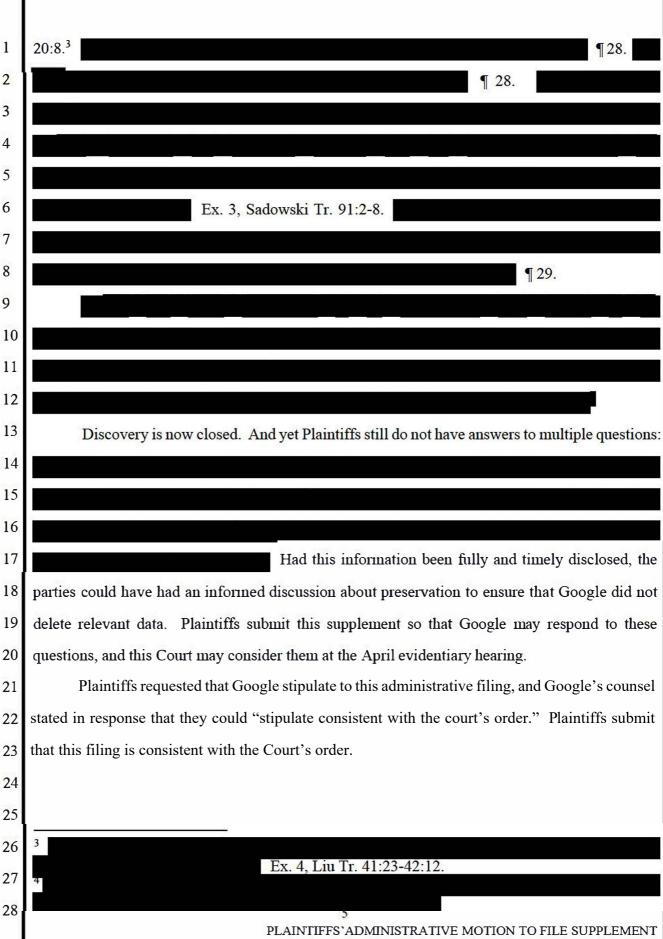
PLAINTIFFS'ADMINISTRATIVE MOTION TO FILE SUPPLEMENT IN SUPPORT OF REQUEST FOR ORDER TO SHOW CAUSE Case No. 4:20-cv-03664-YGR-SVK

1	Pursuant to Local Rule 7-11 and this Court's March 21 Order (Dkt. No. 508), Plaintiffs
2	respectfully submit this administrative motion requesting leave to supplement their motion for
3	sanctions (Dkt. 430) with the material outlined in this five-page motion. The material below
4	consists of recently-discovered evidence showing
5	. Plaintiffs' sanctions motion focused on
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14	further
15	illustrates the severe prejudice caused by Google's pattern and practice of withholding key
16	information regarding identification of private browsing activity, Plaintiffs seek leave to
17	supplement their motion.
18	SUPPLEMENTAL FACTS
19	
20	. ¶ 9.¹
21	
22	
23	. ¶ 10.
24	
25	
26	Except where otherwise noted, all exhibit and paragraph references in this submission are to the
27	Declaration of Mark C. Mao in Support of Plaintiffs' Administrative Motion to File Supplement in Support of Their Request for an Order to Show Cause, which is filed concurrently herewith.
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SUPPLEMENTAL ANALYSIS The Court's November 12 Order was clear. Dkt. 331. Google was required to identify all relevant logs and sources, i.e., "the tools to identify class members using Google's data." Id. at 4. Google's refusal to comply has prejudiced Plaintiffs' ability to obtain and seek preservation of relevant discovery. Plaintiffs' motion for an order to show cause was focused on Google's concealment of the Plaintiffs now seek to supplement with evidence that Google has been See Dkt. 430-21. See Dkt. 430-1 ¶ 19. On March 8, pursuant to this Court's order, Plaintiffs deposed Google employee Mandy Liu, Ex. 4, Liu Tr. 15:2-8. Ex. 4, Liu Tr. 19:24-



PLAINTIFFS'ADMINISTRATIVE MOTION TO FILE SUPPLEMENT IN SUPPORT OF REQUEST FOR ORDER TO SHOW CAUSE Case No. 4:20-cv-03664-YGR-SVK

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